

JAP:FTB/NJM

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

LAWRENCE MUNROE,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

EDWARD GONZALEZ, being duly sworn deposes and states that he is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations ("HSI"), duly appointed according to law and acting as such.

Upon information and belief, in or about October 2017, within the Eastern District of New York and elsewhere, the defendant LAWRENCE MUNROE, together with others, did knowingly, intentionally, and unlawfully conspire and attempt to conspire with others to possess with intent to distribute a substance containing cocaine, a Schedule II controlled substance, contrary to Title 21, United States Code, Section 841.

(Title 21, United States Code, Section 846)

The source of your deponent's information and grounds for his belief are as follows:¹

¹ Because this affidavit is being submitted for the limited purpose of establishing probable cause for the requested arrest warrant, I have not set forth each and every fact I have learned during the course of this investigation.

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COMPLAINT

(21 U.S.C. § 846)

1. I have been a Special Agent with the U.S. Department of Homeland Security since its inception in 2003 and have been a Special Agent with Homeland Security Investigations (“HSI”) since its inception. I am currently assigned to the Internal Conspiracy Group at John F. Kennedy International Airport (“JFK”) in Queens, New York. I have participated in numerous investigations of narcotics smuggling involving international airports and individuals working overseas to transport narcotics into the United States.

2. According to law enforcement databases, the defendant LAWRENCE MUNROE is a United States citizen. MUNROE is an employee of Dnata.² Specifically, MUNROE is a baggage handler who works at JFK Terminal One.

3. Since in or about September 2016, law enforcement agents with HSI, the Drug Enforcement Administration (“DEA”) and United States Customs and Border Protection (“CPB”), among other agencies, have been investigating a narcotics importation conspiracy involving certain individuals who either have worked, or are working, at JFK.

4. In connection with this investigation, since in or about February 2017, HSI has been working with a confidential source (“CS”).³ In or about October 2017, law enforcement learned from conversations with the CS and recordings of the CS’s

² Dnata is a company that provides a range of aviation services, including ramp service, baggage system maintenance, cabin cleaning, and janitorial services.

³ The CS is an individual who is present in the United States without legal status. The CS is cooperating with law enforcement in exchange for immigration benefits and also receives payment for his information. As discussed below, the CS’s information has been corroborated in multiple respects including by direct observation by law enforcement agents.

conversations that some individuals expected a shipment of five “bricks” of cocaine to be present on Fly Jamaica Flight 276, a direct flight from Georgetown, Guyana to JFK, on October 25, 2017. Specifically, the five bricks were expected to be concealed within a blue drawstring bag located in the cargo hold of the airplane.

5. On or about October 25, 2017, when Fly Jamaica Flight 276 landed, law enforcement agents conducted a sweep of the airplane and placed a blue drawstring bag containing five brick-like packages of “sham,” a substance made to approximately resemble cocaine, in the cargo hold of the airplane.⁴

6. Law enforcement surveillance, including electronic and physical surveillance, observed the bags, including the sham cocaine, leaving the airplane and being moved to the Terminal One baggage room.

7. Law enforcement agents observed an individual, later identified as defendant LAWRENCE MUNROE, wearing a bright yellow jacket, beneath which he appeared to have a bulky object or bag on his back. Agents watched MUNROE enter the Terminal One parking garage and approach a Honda Accord, later discovered to be registered to another Dnata employee, Marlon Joseph (“M.J.”). Agents saw MUNROE remove his yellow jacket, uncovering a blue drawstring bag on his back. MUNROE then placed his yellow jacket and the blue drawstring bag into the trunk of the Accord.

⁴ Each package of sham was sized to resemble, in weight and appearance, a one-kilogram brick of cocaine, but the exact weight of the sham is unknown at this time.

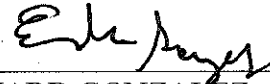
8. M.J., also wearing a bright yellow jacket, approached the Accord; he and MUNROE entered the car. The Accord drove out of the parking garage and was stopped by law enforcement a short time thereafter.

9. Law enforcement agents recovered the blue drawstring bag from the trunk of the Accord. The bag contained three of the five brick-shaped packages that agents had placed into the cargo hold of the airplane. Agents also recovered MUNROE's bright yellow jacket from the trunk of the Accord and found the two additional brick-shaped packages that had been placed into the cargo hold of the airplane.

10. After being advised of his Miranda rights, MUNROE informed law enforcement agents, in sum and substance and in part, that he was not scheduled to work during the arrival of Fly Jamaica Flight 276, but that M.J. had asked him to work the flight. MUNROE further admitted that he took the blue drawstring bag from Terminal One to the Accord and placed it in the trunk.

CONCLUSION

WHEREFORE, your deponent respectfully requests that the defendant
LAWRENCE MUNROE be dealt with according to law.



EDWARD GONZALEZ
Special Agent
U.S. Department of Homeland Security

Sworn to before me this
26th day of October



THE HONORABLE SANKET J. BULSARA
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK